

DECLARATION OF SIMON SANDOVAL-MOSHENBERG

I, Simon Sandoval-Moshenberg, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the statements that follow are true and correct to the best of my knowledge and belief:

1. I am a partner with the law firm Murray Osorio PLLC. I am one of the counsel for the plaintiff in *Abrego Garcia v. Noem*, No. 8:25-cv-00951 (D. Md.).
2. In the *Abrego Garcia* case, during an in-court evidentiary hearing on July 10-11, 2025, Defendants provided the plaintiff and the Court with the attached document, dated July 9, 2025, from Todd M. Lyons, Acting Director, U.S. Immigration and Customs Enforcement (ICE), to all ICE employees, with the subject “Third Country Removals Following the Supreme Court’s Order in *Department of Homeland Security v. D.V.D.*, No. 24A1153 (U.S. June 23, 2025).”
3. Counsel for the plaintiff then moved the attached document into evidence as an exhibit during the in-court evidentiary hearing on July 10-11, 2025, and it was accepted into evidence by the presiding judge.

Executed this 14th day of July 2025 at Fairfax, Va.



Simon Sandoval-Moshenberg